

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

ANDREW CORZO, SIA HENRY,
ALEXANDER LEO-GUERRA, MICHAEL
MAERLENDER, BRANDON PIYEVSKY,
BENJAMIN SHUMATE, BRITTANY
TATIANA WEAVER, and CAMERON
WILLIAMS, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA
INSTITUTE OF TECHNOLOGY, UNIVERSITY
OF CHICAGO, THE TRUSTEES OF
COLUMBIA UNIVERSITY IN THE CITY OF
NEW YORK, CORNELL UNIVERSITY,
TRUSTEES OF DARTMOUTH COLLEGE,
DUKE UNIVERSITY, EMORY UNIVERSITY,
GEORGETOWN UNIVERSITY, THE JOHNS
HOPKINS UNIVERSITY, MASSACHUSETTS
INSTITUTE OF TECHNOLOGY,
NORTHWESTERN UNIVERSITY,
UNIVERSITY OF NOTRE DAME DU LAC,
THE TRUSTEES OF THE UNIVERSITY OF
PENNSYLVANIA, WILLIAM MARSH RICE
UNIVERSITY, VANDERBILT UNIVERSITY,
and YALE UNIVERSITY,

Defendants.

Case No. 1:22-cv-00125-MFK

Hon. Matthew F. Kennelly

**DECLARATION OF DAVID GRINGER IN SUPPORT OF PENN'S MEMORANDUM
OF LAW IN RESPONSE TO STUDENT OBJECTIONS UNDER FERPA**

I, David Gringer, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I have been admitted pro hac vice before this Court. I am an attorney at the law firm of Wilmer Cutler Pickering Hale and Dorr LLP and am counsel for Defendant The Trustees of the University of Pennsylvania (“Penn”).

2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the deposition of named Plaintiff Alexander Leo-Guerra, held on August 25, 2023.

3. On October 31, 2023, Plaintiffs’ counsel wrote an email indicating that Plaintiffs selected one student to be subjected to their motion to compel because her LinkedIn profile said that she needed six years to graduate from high school. Attached hereto as **Exhibit 2** is a true and correct copy of that school’s website indicating that the school includes grades 7 through 12: six years.

4. During a meet and confer on November 3, 2023, Lead Counsel for Plaintiffs Robert Raymar stated that Plaintiffs identified the students at issue by “shooting in the dark.”

5. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from the November 16, 2023 deposition of Eric Furda, Penn’s former Dean of Admissions.

6. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the August 2, 2023 deposition of Elaine Varas, Penn’s Senior University Director of Financial Aid.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 18th day of December, 2023 in New York, New York.

s/ David Gringer

David Gringer